

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
A Report on Technical and Operational)	WT Docket No. 02-46
Issues Impacting the Provision of)	
Wireless Enhanced 911 Services)	DA-02-6666
)	

COMMENTS OF INTRADO INC.

Pursuant to the Public Notice¹ released October 16, 2002, Intrado Inc. (Intrado)² respectfully submits these comments in response to the Federal Communications Commission's (Commission) release of the Report on Technical and Operational Issues Impacting the Provision of Wireless Enhanced 911 Services (Hatfield Report)³. The Hatfield Report is the result of an

¹ Public Notice, "Wireless Telecommunications Bureau Seeks Comment on Report on Technical and Operational Wireless E911 Issues", FCC 02-2666, rel. October 16, 2002.

² Intrado (NasdaqNM: TRDO) is the nation's leading provider of sophisticated solutions that identify, manage and deliver mission critical information for telecommunications providers and public safety organizations.

³ See, "A Report on Technical and Operational Issues Impacting the Provision of Wireless Enhanced 911 Services", by Dale N. Hatfield, rel. October 15, 2002.

independent inquiry into the technical and operational issues affecting the deployment of wireless Enhanced 911 (E911) services⁴.

The Hatfield Report contains a number of principal findings and recommendations regarding the current state of E911 deployment. Proper identification of the numerous barriers to deployment will serve to assist the Commission in assessing E911 services and moreover, should help the Commission resolve remaining E911 implementation problems. Intrado is in agreement with the Commission, the wireless carrier industry, the Local Exchange Carriers (LECs) and the public safety community on the need to promote safety and encourage the successful deployment of E911 services.

It is imperative in the post-September 11th world that wireless implementation move forward as quickly as possible and that the public is assured that the industry and the government are doing all they can to assist with this deployment. Wireless implementation requires the cooperation and coordination of multiple entities to address the technical and operational issues that have to date plagued successful deployment throughout the United States. It is Intrado's strong desire to work cooperatively with the Commission and with the varied, critical parties in support of Phase II implementation in a manner that is fair to all.

⁴ Public Notice, Wireless Bureau Announces Details of Inquiry on Technical and Operational Wireless E911 Issues," DA 02-523, rel. March 5, 2002.

Intrado acknowledges the important work of the Hatfield Inquiry and commends Mr. Hatfield for the thoroughness and comprehensiveness of his Report. Mr. Hatfield successfully balances the varied and divergent interests of the parties involved to produce a neutral and unbiased examination of the status of E911 implementation today. Intrado supports the efforts of the Commission to improve upon Phase II deployment and urges the Commission to keep the interests of citizens and public safety paramount as it considers these and other comments.

DISCUSSION

While not germane to the conclusions drawn by Mr. Hatfield, Intrado would suggest a correction in the technical description of the call flow for Wireless Phase II calls contained in Section 2.2.4 of the Report. As Mr. Hatfield correctly points out, the understanding of architectures and alternatives for deploying Phase II is extremely complex. Specifically, Mr. Hatfield writes that one option for a Phase I call is for the wireless network, specifically a Service Control Point (SCP), to push the call back number to the ALI database.

The Report assumes the same option is available for a Phase II call. However for Phase II wireless services, the ALI database must query (pull) the Phase II information (XY coordinates) and potentially the call back number from the wireless network, specifically the Mobile Positioning Center (MPC) or Gateway Mobile Location Center (CMLC).

Intrado suggests the paragraph on page 11 in Section 2.2.4 be rewritten as follows:

Although the details vary depending upon the capabilities of the legacy network elements and the interface or interfaces chosen, call processing in Phase II implementations is similar to that described for Phase I since the same basic steps are required. When a wireless carrier's MSC receives a 911 call, the Position Determination Equipment ("PDE") locates the mobile terminal either at the start of the call or while the call is in progress. The MPC uses the XY coordinates to interrogate a Coordinate Routing Data Base ("CRDB"). The CRDB returns the information necessary to the MPC to allow it to create a pseudo telephone number that may be used to forward the call to the proper E911 Control Office or Selective Router. The MSC forwards the call and ~~Phase I~~ pseudo telephone number to the E911 Control Office. The E911 Control Office uses the information stored in the Selective Router Data Base to deliver the call and pseudo telephone number to the proper PSAP. When the MPC locates the mobile terminal, it also ~~pushes~~ caches the pseudo telephone number, call back number and location information (XY coordinates). ~~to the ALI data base over the separate data link.~~ When the PSAP's CPE receives the call and pseudo telephone number from the E911 Control Office or Selective Router, it queries the ALI data base using the pseudo telephone number. The ALI data base queries the MPC for this information over a separate data line and, upon response, returns the call back number and Phase II location information which is then processed and made available to the dispatcher. Note that during the call, the location information can be refreshed over the data link between the MPC and the ALI data base.

CONCLUSION

In the wake of last year's attacks, public safety has become an increasingly critical telecommunications concern. Intrado would encourage the Commission to consider strengthening its oversight of current E911 deployments. Intrado believes that the Commission's efforts are best complemented by state and local programs and it would encourage active

partnerships among federal, state and local agencies, wireless carriers, LECs and public safety groups to improve E911 deployment and overall public safety.

Respectfully Submitted,

/s/

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